

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

V&A Collection, LLC

*Plaintiff,*

-against-

Guzzini Properties Ltd.,

*Defendant.*

Case No. 20-cv-01797 (KPF)

Judge Katherine P. Failla

**[PROPOSED] ORDER TO SHOW CAUSE  
AUTHORIZING SERVICE OF PROCESS BY ALTERNATE MEANS AND  
EXPEDITED DISCOVERY CONCERNING THE LOCATION OF ARTWORK**

Upon reading and filing Plaintiff V&A Collection, LLC's (the "Collection") March 5, 2020, Memorandum of Law in Support of its Motion for an Order Authorizing Service of Process by Alternate Means and Expedited Discovery Concerning the Location of Artwork; the March 5, 2020, Declaration of Lindsay E. Hogan, Esq. and Exhibits 1-7; and all papers and proceedings in this action, it is

**ORDERED**, that Defendant Guzzini Properties Ltd. ("Guzzini") shall show cause before this Court, at the United States Courthouse, 40 Foley Square, in the City, County and State of New York, on \_\_\_\_\_, 2020, at \_\_\_\_\_ am/pm, or as soon thereafter as counsel may be heard, why an order should not be made and entered ordering:

- (i) Guzzini to provide all documents responsive to Plaintiff's First Set of Requests for Production of Documents Relating to the Location of Artwork, attached as Exhibit 1 to the March 5, 2020, Declaration of Lindsay E. Hogan, Esq. within one (1) day; and
- (ii) Any such other and further relief as the Court deems just and proper;

**IT IS FURTHER ORDERED** that, sufficient reason having been shown therefor, alternative service of the Collection's Summons and Complaint (Dkt. No. 1-1 at 1-9), and the papers underlying this motion by (i) Federal Express, overnight delivery, to Counsel for Guzzini, Wendy J. Lindstrom, Esq., MAZZOLA LINDSTROM LLP, 733 Third Avenue, 15th Floor, New York, New York 10017, (646) 216-8300; and (ii) Federal Express to Guzzini's principal place of business, Guzzini Properties Ltd., 21-24 Milbank Tower, 4th Floor, London SW1P 4QP; on or before March \_\_\_, 2020, shall be deemed good and sufficient service on Guzzini under Fed. R. Civ. Proc. R. 4(f)(3) and (h)(2); it is further

**ORDERED**, that that sufficient reason having been shown therefor, within one (1) day, Guzzini shall notify in writing, with a copy to Plaintiff's counsel, (1) the party to whom it allegedly transferred ownership and/or physical possession of the artwork at issue in this lawsuit, and (2) if different than the party identified under Section (1), the party who currently owns and/or physically possesses the artwork at issue in this lawsuit, of the fact of this lawsuit and of the Collection's claims, including a copy of the Complaint herein; and it is further

**ORDERED** that service of a copy of this order upon Counsel for Guzzini, Wendy J. Lindstrom, Esq., MAZZOLA LINDSTROM LLP, 733 Third Avenue, 15th Floor, New York, New York 10017, (646) 216-8300, by Federal Express, overnight delivery, on or before March \_\_\_, 2020, shall be deemed good and sufficient service thereof.

Dated: \_\_\_\_\_, 2020  
New York, New York

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Katherine Polk Failla  
United States District Judge